

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

KELLY MILLIGAN,
ON BEHALF OF HIMSELF AND
ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

v.

MERRILL LYNCH, PIERCE, FENNER &
SMITH INC., BANK OF AMERICA CORP.,
and JOHN/JANE DOE 1, THE SENIOR VICE
PRESIDENT–HUMAN RESOURCES
GLOBAL BANKING AND GLOBAL
WEALTH AND INVESTMENT
MANAGEMENT ADMINISTRATION AT
BANK OF AMERICA CORP.,

Defendants.

Case No. 3:24-cv-00440-KDB-DCK

Judge Kenneth D. Bell
Magistrate Judge David Keesler

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Kelly Milligan (“Plaintiff”) and Defendants Merrill Lynch, Pierce, Fenner & Smith Inc. (“Merrill Lynch”) and Bank of America Corp. (“Bank of America”) (together, “Defendants”) (together with Plaintiff, the “Parties”) jointly move this Court to enter the attached Stipulated Protective Order to govern the disclosure of confidential information in the above-captioned case. In support of this Motion, the Parties state as follows:

1. Plaintiff filed his Complaint on April 30, 2024. Dkt. 1.
2. On August 13, 2024, this Court entered its Pretrial Order and Case Management Plan (“Pretrial Order”). Dkt. 36.
3. Pursuant to the Pretrial Order, the Parties’ deadline to submit a proposed protective order is September 30, 2024. *Id.* p. 1.

4. The Parties have conferred and agree to the attached Stipulated Protective Order to protect confidential information from inappropriate disclosure.

5. Good and adequate cause exists to support the entry of the Stipulated Protective Order.

WHEREFORE, for the above stated reasons, the Parties request that this Court enter the attached proposed Stipulated Protective Order.

This is the 30th day of September 2024.

Respectfully submitted,

By: /s/ Robert A. Muckenfuss

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of September, 2024, the foregoing was filed with the Court using the CM/ECF system.

/s/ Robert A. Muckenfuss
Robert A. Muckenfuss